

FILED

AUG - 2 2018

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

VALARIE ROBINSON,

Defendant.

4:18CR660 HEA/PLC

INDICTMENT

COUNT ONE

The Grand Jury charges:

On or about June 11, 2015, within the Eastern District of Missouri, the defendant,

VALARIE ROBINSON

in a matter within the jurisdiction of the Social Security Administration, a department of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, in a document entitled "Redetermination Summary for Determining Continuing Eligibility for Supplemental Security Income Payments," did state and represent and cause to be stated and represented that she was never married to Robert Pearson, and as defendant **VALARIE ROBINSON** well knew, she and Pearson had been legally married

since April 1991, and defendant VALARIE ROBINSON had received benefits from the United States Veterans Administration based upon assertions that she and Pearson were legally married

In violation of Title 18, United States Code, Section 1001(a).

COUNT TWO

The Grand Jury further charges that:

On or about July 1, 2015, within the Eastern District of Missouri, the defendant,

VALARIE ROBINSON,

did embezzle, steal, purloin, or knowingly convert to her use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: \$584.70 in the form of Social Security Administration Supplemental Security Income benefit payments, creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

COUNT THREE

The Grand Jury further charges that:

On or about July 31, 2015, within the Eastern District of Missouri, the defendant,

VALARIE ROBINSON,

did embezzle, steal, purloin, or knowingly convert to her use, and the use of others, money of the United States or of any department or agency thereof, or any property made or

being made under contract for the United States or any department or agency thereof, to wit:

\$584.70 in the form of Social Security Administration Supplemental Security Income benefit

payments, creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN,
United States Attorney

DIANE E.H. KLOCKE, #61670MO
Special Assistant United States Attorney